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JUDGE: The Honorable Timothy Dore
DATE: June 23, 2017
TIME: 9:30 a.m.
CHAPTER: 13
RESPONSE DATE: June 16, 2017

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In Re the Matter of:
GITA ANSARI,
Debtor.

NO. 16-15552-TWD

**MOTION CONFIRMING THERE IS
NO STAY IN EFFECT AS TO
DEBTOR**

I. RELIEF REQUESTED

Amir Nassiri, an unlisted creditor of the debtor herein, moves the court for an order confirming there is no stay in effect as to the Debtor based on the following:

1. Previous Filing – 11 U.S.C. Sec. 362(c)(3)(A). The Debtor previously filed for bankruptcy protection on May 29, 2015, under case number 15-13369-TWD, and it was dismissed on May 19, 2016.

II. BASIS FOR RELIEF

On December 13, 2016, the Court entered an Order Denying Stay Extension and held that “[t]he automatic stay imposed under 11 U.S.C. § 362(a) remains in effect over all property of the estate. In re Rinard, 451 B.R. 12 (Bankr. C.D. Cal. 2011).” The debtor is a third-party defendant in a King County, Washington Superior Court lawsuit (Case No. 16-2-01257-4). Mr. Nassiri seeks confirmation that he may continue to pursue his claims against the debtor.

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III. CONCLUSION

For the reasons set forth above this motion should be granted.

DATED this 31st day of May, 2017.

INSLEE, BEST, DOEZIE & RYDER, P.S.

By /s/ Christopher W. Pirnke
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